

CHAPTER 5-Emergency plans, training, recordkeeping and reporting

5.1 IOSHA Hazard Communication Standard: The IOSHA Hazard Communication Standard, also known as the Worker's Right-to-Know Law, was enacted to ensure that hazards in the workplace are identified and communicated to all employees. The Hazard Communication Standard applies to any business that uses, distributes, or imports hazardous chemicals, **regardless of the number of individuals employed.**

You must:

- Maintain compliance with the Hazard Communication Standard (Workers Right-to-Know Law) by:
- Develop a **written** Hazard Communication Program. The Hazard Communication Program combines all of the required components of the Hazard Communication Standard into one working document. See - for a sample Hazard Communication Program. Note that, if you choose to use the sample program, you must read through it to ensure that it fits your shop's needs. If the sample does not fit your shop's needs, you must tailor it to meet your needs.
- Provide employees with information and training on hazardous chemicals found in the workplace so that employees are aware of the chemical hazards, can read an MSDS and label, and know what to do in an emergency. Make sure all employees know where the MSDS book is located.
- Develop a list of all chemicals at the facility (product names are acceptable, see
- Maintain an updated inventory of Material Safety Data Sheets (MSDS) **for all chemicals** in the workplace. If you receive a chemical without an MSDS, write to the supplier to request one. It is the supplier's responsibility to send out MSDSs. It is your responsibility to ensure that you have all relevant MSDSs and to update your MSDS log (see the sample Hazard Communication Program in section.) You must keep the MSDS for a minimum of 30 years after you stop using a chemical.
- Ensure that all containers, tanks, pipes, etc. are properly labeled. If you receive a chemical that is not properly labeled, call your supplier and insist on proper labeling to ensure compliance with the regulations. If you transfer chemicals from their original container into another container, you must properly label the second container.

You should:

- Keep MSDSs for the duration of a given worker's employment plus 30 years (in case of future liability regarding employee exposure to hazardous materials at the workplace.)
- Photocopy the original label (if possible) and either laminate or tape over the label so that it will not smear if it gets wet when transferring chemicals from their original container to another container.

5.2 Other IOSHA plans:

You must:

- Develop a written emergency action plan, including a fire prevention plan, if you have 10 or more employees (see for an example of an Emergency Information list to

place near your phones). If you have 10 or fewer employees, the plan may be communicated verbally. (See for a sample Emergency Action Plan).

- Comply with IOSHA 301 and 300 recordkeeping if you have 10 or more employees.
- Establish a lockout program (formerly known as "Lockout/Tagout.") If any of your employees perform maintenance activity that is **not** routine, repetitive, and integral to the use of the equipment for production purposes, they must lockout all energy sources before beginning work. Energy sources include not only electrical energy, but also hydraulic and pneumatic energy sources. The force of gravity must also be addressed in the lockout program by taking measures such as bracing equipment (such as your hydraulic or pneumatic lift) to prevent it from falling in the event that hydraulic or pneumatic controls fail. Locks, along with a warning tag, must be placed on all energy sources prior to working on equipment. NOTE: The Indiana Department of Labor does NOT recognize a tag without a lock. A lock is required.
- For tools that plug into an outlet, a lock is not required, but the tool must be unplugged and the plug kept within the control of the person working on the equipment. The Indiana Department of Labor recommends placing the plug in your pocket.
- Give all employees must receive annual lockout training: even employees who do not perform maintenance work must be trained to recognize and respect a lockout and tag and know not to remove the lock. If you hire an outside contractor to perform maintenance work on-site, your employees must be trained to recognize and respect the lockout system utilized by the contractor.

You should (if you have 10 or fewer employees):

- Develop a written emergency action plan, including a fire prevention plan. Written programs help ensure that all information in the plans is conveyed to each employee, and also allow employees to refer back to the plans when questions arise. By having proper written programs in place, your shop will be in compliance with this IOSHA regulation in the event that your total employee count exceeds 10 employees.
- Follow IOSHA 301 and 300 recordkeeping responsibilities. These records will allow you to identify any injury-related trends and to address the causes of such trends. By properly conducting 301 and 300 recordkeeping responsibilities, your shop will be in compliance with this IOSHA regulation in the event that your total employee count exceeds 10 employees.

You must (for medical services):

- Have someone on site that is trained in first aid if you are more than 3 minutes away from medical facilities.
- Have a written procedure and employee training advising employees how to determine if medical treatment is needed. A written plan is not required if your shop is within 3 minutes of a medical facility and you choose to transport patients rather than provide first aid.
- Have your first aid trained personnel be trained in Blood Borne Pathogens and give them the opportunity to get a Hepatitis B vaccine (at owner's expense) if first aid is to be provided on site. Contact BuSET or CTAP for more information.

- Provide protective equipment (gloves, etc.) and training to all employees, whether your shop's policy is to provide first aid on site or to transport patients to a medical facility.

5.3 Emergency action plan: IDEM and IOSHA requirements:

You must (for IDEM):

- Assign an emergency coordinator, who is responsible for the following duties:
- Post the following information next to your shop's telephones:
 - ✓ The name and telephone number of your shop's emergency coordinator;
 - ✓ The location of your spill control material, fire extinguisher(s), and, if present, fire alarm; and
 - ✓ The telephone number of the fire department (unless your shop has a direct alarm).
- Ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies;
- Respond to emergencies that arise by doing the following:
 - ✓ In the event of a spill, contain the flow of hazardous material to the extent possible, and clean up the hazardous material and any contaminated materials or soil as soon as practicable. See Section 3.8 for more information on spills;
 - ✓ In the event of a fire, call the fire department or put out the fire using a fire extinguisher;
 - ✓ Immediately notify the chief of the responding fire department when a release of hazardous materials creates an unreasonable risk to public safety from fire or explosion.
 - ✓ In the event of a fire, explosion, or a release which could threaten human health outside of the shop, or when you have knowledge that a spill has reached surface water, you must immediately notify IDEM's emergency response section at 317/233-7745 or toll free at 888/233-7745. IDEM will request the following information*:
 - Your shop's name, address, and EPA identification number;
 - Date, time, and type of incident (e.g., spill or fire);
 - Quantity and type of hazardous material involved in the incident;
 - Extent of injuries, if any;
 - Estimated quantity and disposition/makeup of recovered materials, if any; and,
 - Acknowledgment that you are located within a wellhead protection area (if you are).
 (*Call IDEM even if you do not yet have all of the information that will be requested.)

In the event of a fire or a spill that creates an unreasonable risk to public safety from fire or explosion, you should call the fire department first. Contact the other regulatory agencies and affected parties afterwards.

According to IOSHA standard 1910.38 Employee Emergency Plans and Fire Prevention Plans, this plan is to be in writing and trained upon if you have 10 or more employees, otherwise it is to be given verbally. The designated actions employers and employees must take to ensure employee safety from fire and other emergencies:

- 1). Emergency Escape procedures, and route assignments;
- 2). Procedures to be followed by employees who remain to operate critical plant operations before they evacuate;
- 3). Procedures to account for all employees after emergency evacuation has been completed;
- 4). Rescue and medical duties for those employees who are to perform them;
- 5). The preferred means of reporting fires and other emergencies; and
- 6). Names or job titles of the persons or departments who can be contacted for further information or explanation of duties under the plan.

5.4 Recordkeeping:

You must (for IDEM):

- Determine your hazardous waste generator classification and document your classification. In order to do this, you must keep records of the amount of hazardous waste generated, accumulated and stored on-site and recycled on-site or manifested off-site. A copy of the manifest must be kept at the facility that generated the waste for a minimum of three years.
- Conduct hazardous waste manifesting, which includes the following:
- Complete EPA Form 8700-22-(uniform hazardous waste manifest form) each time you have hazardous waste transported to an off-site facility that is located within the state of Indiana. You may obtain this form from your hauler, or you may order the form from any private company who sells them, or your disposer may provide them for you. If you are sending your hazardous waste to an out-of-state facility, you must use the receiving state's manifest form. If the receiving state does not require its own manifest, then you must use the Uniform Manifest.
- Prepare and submit a biennial report if you ship your hazardous waste off-site to a treatment, storage and disposal facility within the United States:
 - 1). On forms provided by the commissioner according to the instructions on the form.
 - 2). To the: Department of Environmental Management
Office of Solid and Hazardous Waste
100 N. Senate Ave P.O. Box 601
Indianapolis, IN 46206-6015
 - 3). No later than March 1 of each even-numbered year.
 - 4). Reporting for exports of hazardous waste is not required on the biennial report form. A separate annual report is required, no later than March 1 of each year, summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year.
- Furnish additional reports concerning the quantities and disposition of wastes identified if the Commissioner deems necessary under IC13-7-8.5-2. The person who

signs the manifest must have received proper training on the manifest form and procedures (see Section 3 for more information.)

- Have each party that takes possession of the waste must sign the original manifest and keep one copy. The remaining portion of the manifest continues on with the hazardous waste shipment until it reaches its final destination.
- Have the TSDF send a signed copy of the manifest back to you to verify that the shipment actually arrived.
- Contact your hauler and/or the designated facility to determine the status of the hazardous waste if the copy of the manifest is not sent to you within 35 days of the date the waste was accepted by your hauler.
- Complete an exception report if the copy of the manifest is not sent to you within 45 days of the date the waste was accepted by your hauler that:
 - ✓ Is accompanied by a legible copy of the manifest for which you do not have confirmation of delivery.
 - ✓ Is accompanied by a letter that you or your designated representative has signed. The letter must explain the efforts you've taken to locate the hazardous waste and the results of those efforts.Submit a legible copy of the manifest, along with a note or letter indicating that you have not received confirmation of delivery if the copy of the manifest is not sent to you within 60 days of the date the waste was accepted by your hauler. Send this letter to IDEM's Office of Land Quality.
- Keep copies of all hazardous waste manifests for 3 years.

You should:

- Keep all copies of your hazardous waste manifests indefinitely.

You must (for IOSHA: 1904.1 recording and reporting occupational injuries and illnesses):

- Keep a log of employee occupational injuries and illnesses commonly called the IOSHA 300 log. When completing the IOSHA 300 log for work related injuries, it is important to distinguish recordable injuries or illnesses (those that must be included in the log) from those that are not recordable.
- Not record injuries or illnesses that require first aid only (i.e. simple wound cleaning, applying ointment, and simple bandaging), even if the simple first aid was done at a hospital or doctor's office.
- Record if medical treatment involves such things as stitches, treatment of infection, removal of embedded foreign objects, or other similar activities.
- Post all recordable cases to the IOSHA 300 log within six days of occurrence or knowledge of its occurrence. If the status of a work-related injury or illness changes, the log entry must be revised accordingly.

When a case is recordable, you must classify the case as either an injury or an illness:

- Injury: An injury is usually a result of an accident or exposure involving a single incident in the work environment. Examples include cuts, burns, fractures, strains, chemical burns, or insect bites.

- **Illness:** An illness is generally a condition resulting from prolonged exposure to a hazardous work environment. Examples include rashes, poisonings, respiratory conditions caused by repeated exposure to chemicals or irritants, heat exhaustion, hearing loss due to noise, and repetitive motion cases such as carpal tunnel.

The back of the OSHA 300 log contains more descriptions of injuries and illnesses to help in your determination process.

- Keep a Supplementary Record (OSHA 301 form) which details each work related injury or illness
- Each year, during the entire month of February, you must prominently post the summary of injuries and illnesses for the previous year (this summary is part of the OSHA 300 log.) This posting is usually placed on the same bulletin board or area that displays the required labor postings. OSHA 300 logs and Supplementary Records must be kept for a minimum of five years. You can also call the Indiana Department of Labor's BuSET program, at 317-232-2688. In addition, a comprehensive guidance document entitled, Recordkeeping Guidelines for Occupational Injuries and Illnesses is available from BuSET.

You must (for Department of Transportation):

- If your shop has a commercial motor vehicle(s), you must maintain the following records:
- Maintain a driver qualification file for each driver that your shop employs. This file must include:
 - ✓ A copy of a medical examiner's certificate stating that the driver is physically qualified to drive a motor vehicle.
 - ✓ A list of traffic violations that the driver was convicted of, or that resulted in the driver's forfeiting bond or collateral. This list may be given to you by the driver, and must cover the preceding 12 month period.
 - ✓ A copy of the driver's application for employment.
 - ✓ A copy of a motor vehicle report from each state in which the driver held a motor vehicle operator's license during the past three years, and documentation of the driver's employment record, as investigated by you, concerning the past three years. The past employment record must include the past employer's name and address, the date the employer(s) was contacted, and the employer's comments with respect to the driver.
 - ✓ Hours of Service of Drivers ("duty status"). If your shop owns or uses a commercial motor vehicle (i.e., a vehicle owned or used by the shop that weighs 10,001 pounds or more), you must keep track of the driver's duty status for each 24 hour period, and must keep the duty status record for six months. You may purchase a duty status form or you may make your own log. If you choose to make your own log, it must include the following information, when applicable:
 1. Month, day and year for the described 24 hour duty period;
 2. Starting time for the 24-hour period being described;
 3. Total mileage driven during the 24-hour period;

4. Truck/vehicle number;
 5. Name of the carrier (or the name of your shop if the driver works for you);
 6. Driver's signature (certifying that all information provided in the service record is correct);
 7. Address of the driver's main office;
 8. Name of each city or town where the driver's duty status changes;
 9. Name of any co-driver;
 10. Total hours in each duty status (summing to 24 hours); and
 11. Shipping paper document number(s), or the name of the shipper and commodity.
- Ensure that drivers prepare a Written Service Report each day that they operate a commercial motor vehicle. Keep the written service reports and certifications of repair for at least 3 months from the date they were prepared, and keep a copy of the latest report with the vehicle. The report must:
 - Identify the vehicle and list any deficiencies that would affect its safe operation or cause it to mechanically break down. If the report includes such deficiencies, the next driver to use the vehicle must sign the report certifying that the deficiencies have been corrected before he/she may drive the vehicle.
 - Maintain the following records for commercial motor vehicles that your shop owns, leases, or borrows for 30 consecutive days or longer:
 - ✓ Vehicle identification (including company number, if one has been assigned, make, serial number, and tire size.)
 - ✓ Retain the record at the shop where the vehicle is primarily housed and a copy must be kept in the vehicle. This record must be retained for a period of one year.
 - ✓ If the vehicle is sold (or otherwise no longer in the possession of your shop), this record must be retained for a period of six months after the vehicle leaves your possession.
 - ✓ Maintenance schedule (including type of maintenance and date vehicle is due for scheduled maintenance.) As with the vehicle identification, the maintenance schedule must be kept on file where the vehicle is housed or maintained for a period of one year and for six months after the vehicle leaves your control. A copy of the record must be carried on the vehicle.
 - ✓ Annual inspection records. Inspection reports must be kept at the shop where the vehicle is primarily housed and must be accompanied by documentation that the person who performed the inspection was qualified to do so (for example, a brake inspector is considered qualified if that person has completed a brake service or brake inspection apprenticeship program or has brake-related training or experience totaling at least one year). These reports must be retained for 14 months from the date they were prepared.
 - ✓ Repair records. These records must be retained for three months from the date they were prepared.
 - ✓ Lubrication records. Lubrication records must be retained where the vehicle is housed or maintained for a period of one year and for six months after the

vehicle leaves your control. A copy of the record must be carried on the vehicle.

5.5 Reporting:

You must (for IDEM):

- Send a signed copy of the manifest back to you to verify that the shipment actually arrived.
- Contact your hauler and/or the designated facility to determine the status of the hazardous waste if the copy of the manifest is not sent to you within 35 days of the date the waste was accepted by your hauler.
- Complete an exception report if the copy of the manifest is not sent to you within 45 days of the date the waste was accepted by your hauler. The report must include:
 - ✓ Is accompanied by a legible copy of the manifest for which you do not have confirmation of delivery.
 - ✓ Is accompanied by a letter that you or your designated representative has signed. The letter must explain the efforts you've taken to locate the hazardous waste and the results of those efforts.
- Submit a legible copy of the manifest, along with a note or letter indicating that you have not received confirmation of delivery if the copy of the manifest is not sent to you within 60 days of the date the waste was accepted by your hauler. Send this letter to IDEM's Office of Land Quality.

Vehicle air conditioning service:

- If your shop performs work on motor vehicle air conditioning (MVAC) systems, you must submit a one-time equipment owner certification form to EPA, and you must maintain the following records and certifications on-site:
- EPA equipment owner certification form for at least one recovery or recovery/recycling machine
- Certification forms for each trained technician and facility operator
- Invoices and records documenting recovered refrigerant that was sent off-site for reclamation
- Documentation of refrigerant purchases in quantities of less than 20 pounds
- Submit a one-time notification form to IDEM's Office of Land Quality and your local POTW if you are discharging hazardous waste to the sanitary sewer.
- Report spills (see Section 3.8.)

For your local POTW:

- Contact your local publicly owned treatment works (wastewater treatment plant) to ensure that you are meeting the treatment plant's limits.
- Submit a one-time notification form to the POTW (and to IDEM's Office of Land

- Quality) if you are discharging hazardous waste to the sanitary sewer.
- Report spills (see Section 3.8.)

For your local fire department:

- Report spills (see Section 3.8.)

For IOSHA:

- **If a work-related fatality or catastrophe** (i.e., causing three or more employees to be admitted to the hospital for medical treatment), you must report the fatality or catastrophe to the Indiana Department of Labor within eight hours of your knowledge of the fatality or catastrophe. The report must be called in to the Department of Labor at 317/232-2693, 24-hours per day, 7-days per week. You must provide the following information when you call:
 - ✓ Names of business
 - ✓ Location of incident
 - ✓ Time of incident
 - ✓ Number of fatalities or hospitalized employees
 - ✓ Contact person at your shop
 - ✓ Phone number, and
 - ✓ Brief description of the accident
 - ✓ Leave your name and phone number

5.6 Employee training: As a shop manager or owner, you are required to train your employees

INITIALLY UPON HIRE AND ANNUALLY THEREAFTER, to help ensure worker safety. Many of IOSHA's standards explicitly require you to train employees in the safety and health aspects of their jobs. Other IOSHA standards make it your responsibility to limit certain job assignment to employees who are "certified," "competent," or "qualified," meaning that they have had special previous training.

You must (for fire protection/prevention):

- Make sure your local fire department is familiar with the fire hazards at your business.
- Train employees on safety procedures and responsibilities during a fire emergency.
- Train employees on exit routes, including alternative exits.
- Provide appropriate fire extinguishers, and train employees on the availability and use of fire extinguishers, alarm systems, sprinklers, etc.
- Store flammable or combustible materials according to The Department of Fire and Building Services' requirements (see Sections 3.3 and 3.4.) Post "NO SMOKING" signs in areas where flammable or combustible materials are used or stored.
- Ensure that explosion proof lighting is used in storage areas for flammables.
- Keep fire doors closed at all time.
- Know if your shop has firewalls and where they are located.

The training requirements in this section are separated into three groups:

Front Desk Employees (and any other employees who **do not** have contact with the chemicals or equipment used at the shop.)

Mechanics/Technicians (and any other employees who have contact with the chemicals or equipment used at the shop.)

Managers and Owners (employees who have overall responsibility for the shop and also have contact with the chemicals or equipment used.)

While there is some overlap in the training requirements for these three groups of employees, there are enough differences to warrant separate sections. Note that Large Quantity Generators are required to conduct more training than is discussed in this section.

Front desk employees must:

- Be trained on the basic hazard communication program and know:
- Know where the Material Safety Data Sheet (MSDS) book is located.
- Not to touch chemicals or their containers (i.e., touching drums, lifting lids, etc.)
- Know to stay away from equipment such as hydraulic lifts, grinding wheels, and tools operated by compressed air.
- Know to call for help if a hazardous material is spilled or if they hear or smell anything unusual. You must later document when the spill, sound, or smell occurred, and the circumstances of the incident.

Mechanics/technicians must:

- Be trained on the basic hazard communication program when hired and whenever a new hazard is introduced into their area, and must:
- Know where your written program is located.
- Be familiar with entire list of chemicals in your facility, and know where your MSDS book is located.
- Know how to determine chemical hazards including: health hazards, fire and explosion hazards, the required personal protective equipment, and reactivity (with other chemicals or water.) This information may be obtained from the chemical's MSDS
- Be able to determine proper places to store chemicals.
- Know what to do if there is a spill (see Section 3.8 for more information).
- Know and be able to communicate emergency response and evacuation procedures (refer to your shop's emergency action plan or the sample emergency action plan in Attachment B.)

- Be familiar with the type of fire extinguishers located at the shop (review the label) and their correct use. Do not fight fire alone.
- Be trained on the shop's lockout/tagout program when hired and whenever a new energy source is added.
- Be trained in the selection and use of personal protective equipment. Refer to the personal protective equipment section in area. Have DOT training (if your employees are responsible for shipping hazardous waste):
- Have general awareness training (requirements addressed within the hazard communication training.)
- Have function specific training: Employees must be able to demonstrate that they can:
 - Select the proper container for the waste being considered.
 - Properly close the containers for transport, including putting the gasket on containers when required.
 - Properly label and mark the containers. Use the Hazardous Waste sticker (see the illustration on page 98) and the Flammable Liquid, and Corrosive or Poisonous labels properly complete a hazardous waste manifest.
 - Load containers onto the truck.
- Have safety training (requirements addressed within the hazard communication training.)
- Not go more than 2 years without being re-trained on DOT issues.

Other training:

- Be trained by an EPA-certified program prior to working on MVAC systems. You may obtain a current list of EPA-accredited training programs by calling the Stratospheric Ozone Hotline at (800) 296-1996. If employees accept shipments of hazardous materials, they must know how to read chemical labels so that you can refuse a shipment if it is incorrectly labeled. [DOT, IOSHA]
- If you operate the shop's tow truck, you must:
 - Be aware of the materials of trade exemption and of the presence of the hazardous materials. (See the material handling in Chapter 2.5.8 for more information.)
 - If you operate or maintain the shop's tow truck, you must:
 - Be familiar with the use and care of the fire extinguisher provided on the truck.

Managers and owners must:

- Ensure that basic hazard communication training is conducted.
- Immediately train all new employees on your shop's basic hazard communication program
- Train existing employees when they are assigned new responsibilities or when new or different chemicals are used.
- Train contractors on all hazards in the workplace.
- Ensure that employees are trained on the use and selection of personal protective equipment. See area.

- Ensure that a trained first-aid responder is at the shop during working hours if the shop is not located within 4 minutes of a medical facility.
- Have thorough knowledge of the Hazard Communication Standard and your hazard communication program.
- Know where your written hazard communication program is located.
- Be familiar with the entire list of chemicals in your facility, and know where your MSDS book is located.
- Know how to determine chemical hazards including: health hazards, fire and explosion hazards, the required personal protective equipment, and reactivity (with other chemicals or water.) This information may be obtained from the chemical's MSDS.
- Know how to read chemical labels so that you can refuse a shipment if it is incorrectly labeled.
- Determine proper places to store chemicals.
- Know what to do if there is a spill (see Chapter 3.7 for more information).
- Establish a respirator program including medical monitoring, training, and planning if you have respirators. Know and be able to communicate emergency response and evacuation procedures.
- Be familiar with the type of fire extinguishers located at the shop (review the label) and their correct use. Do not fight fire alone.
- Be trained on the shop's **lockout/tagout program** when hired and whenever a new energy source is added.

DOT training (only required if you are responsible for shipping hazardous waste):

- General awareness training (requirements addressed within the hazard communication training.)
- Function specific training: Employees must be able to demonstrate that they can:
 - ✓ Select the proper container for the waste being considered.
 - ✓ Properly close the containers for transport, including putting the gasket on containers when required.
 - ✓ Properly label and mark the containers.
 - ✓ Use the Hazardous Waste, Flammable Liquid, and Corrosive or Poisonous labels.
 - ✓ Properly complete a hazardous waste manifest.
 - ✓ Load containers onto the truck.
- Safety training (requirements addressed within the hazard communication training.)
- Not go more than 2 years without re-training your employees on DOT issues.

Hazardous waste (RCRA) emergency training (for IDEM):

- Assign an emergency coordinator (usually the manager) to perform the following duties:
 - ✓ Post the following information next to the telephone:
 - ✓ The name and telephone number of your shop's emergency coordinator;
 - ✓ The location of your fire extinguisher(s), spill control material, and, if present,

- fire alarm; and
- ✓ The telephone number of the fire department (unless your shop has a direct alarm.)
- ✓ Ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies;
- ✓ Respond to emergencies that arise by doing the following:
- ✓ In the event of a fire, call the fire department or put out the fire using a fire extinguisher;
- ✓ In the event of a spill, contain the flow of hazardous waste to the extent possible, and clean up the hazardous material and any contaminated materials or soil as soon as practicable;
- ✓ In the event of a fire, explosion, or a release which could threaten human health outside of the shop, or when you have knowledge that a spill has reached surface water, you must immediately notify IDEM's Emergency Response Section at 317/233-7745 or toll free at 888/233-7745. You must provide the following information to IDEM:
 1. Your shop's name, address, and EPA Identification Number;
 2. Date, time, and type of incident (e.g., spill or fire);
 3. Quantity and type of hazardous material involved in the incident;
 4. Extent of injuries, if any; and
 5. Estimated quantity and disposition/makeup of recovered materials, if any.

Other training:

- Be trained by an EPA-certified program if they are working on MVAC systems. Understand the legal responsibilities associated with signing the manifest, and the required elements of the manifest form (make sure the manifest matches the container label.)
- Know how to read chemical labels so that you can refuse a shipment if it is incorrectly labeled. [DOT, IOSHA]
- If your shop uses a tow truck, you must:
 - ✓ Ensure that drivers are aware of the materials of trade exemption and of the presence of hazardous materials.
 - ✓ Ensure that a carbon dioxide, dry chemical or equivalent fire extinguisher is in good working condition and securely mounted on the truck and that drivers and maintenance personnel are familiar with the use and care of the fire extinguisher provided.

For all employees, you should:

- Conduct all relevant training initially and annually thereafter.
- Make sure all employees sign a form stating that he or she understands the training received. You may use the example form for employee training in attachment.